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Friday, April 29, 2022

**VIA ECF**

Honorable District Judge John P. Cronan  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street, Courtroom 20C  
New York, New York 10007-1312

Re: Kaye v. Health and Hospitals Corporation et. al.  
18-CV-12137(JPC)(JLC)

Dear Honorable District Judge Cronan:

Plaintiff respectfully writes seeking leave of the court for a two week extension to file her opposition to Defendants' motion for summary judgment. In light of Plaintiff's application earlier this week regarding Defendants' Answer and Summary Judgment seeking to dismiss the wrong Amended Complaint, Plaintiff seeks additional time so that the Court can resolve this matter and so that she can conserve the expenditure of additional resources.

As per Your Honor's Rules of Practice, this is Plaintiff's third request for an extension. The Court graciously granted the other two requests. However, in light of Defendants' error, that Plaintiff has brought to the Court's attention, I am seeking additional time for the Court's input as well as to engage Dr. Kaye, who currently resides in Albuquerque, New Mexico. As it stands, depending on the Court's resolution of Plaintiff's application, Defense Counsel has requested until May 3, 2022 to re-submit their motion if the Court so rules.

Respectfully submitted,

/s/

Special Hagan, Esq.  
Attorney for Melissa Kaye, MD

Cc: Donna Canfield, Esq.  
Counsel for Defendants